

1 John DiNapoli (State Bar No. 84365)
ifd@dslaw.net
2 Steven J. Sibley (State Bar No. 152365)
sjs@dslaw.net
3 DINAPOLI & SIBLEY
Ten Almaden Boulevard, Suite 1250
4 San Jose, CA 95113-2271
Telephone: (408) 999-0900
5 Facsimile: (408) 999-0191

6 Robert A. McLean (Admitted Pro Hac Vice)
ramclean@farris-law.com
7 FARRIS BOBANGO BRANAN PLC
One Comemrce Square, Suite 2000
8 40 South Main Street
Memphis, TN 38103
Telephone: (901) 259-7100
Facsimile: (901) 259-7150

10 Attorneys for defendant and Counterclaimant
11 PRIZE CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

izmo CRM, INC.,
Plaintiff,
v.
PRIZE CORPORATION, and DOES 1
through 20, inclusive,
Defendants.

CASE NO. C10-00518 LHK

**STIPULATED REQUEST FOR ORDER
AND [PROPOSED] ORDER EXTENDING
DISCOVERY DEADLINE**

PRIZE CORPORATION, and DOES 1 through 20, inclusive,

Defendants.

AND RELATED COUNTER-CLAIM

Pursuant to Civil Local Rules 6-2 and 7-12, this Stipulation and Order to Extend the Discovery Cut-Off (the "Stipulation and Order") is made by and between Plaintiff and Counter-defendant izmo CRM, Inc. and Defendant and Counterclaimant Prize Corporation in the above-captioned matter for the limited purpose of allowing additional time for Prize Corporation to

1 deposite Tej Soni, the president of izmo CRM, Inc. and to take the deposition of izmo CRM, Inc.'s
2 designated representative per FRCP 30(b)(6).

3 By order of this court dated April 14, 2011, all discovery in this matter shall be completed
4 by May 13, 2011. Mr. Soni was noticed on April 15, 2011 for a deposition on April 28, 2011 and
5 the representative(s) of izmo CRM, Inc. were noticed on April 19, 2011 for a 30(b)(6) deposition
6 on May 2, 2011. Per counsel for izmo CRM, Inc., Tej Soni, a citizen of India, is out of the United
7 States until the end of May and cannot present himself for deposition at the noticed times.
8 Counsel for izmo CRM, Inc. has represented that Mr. Soni will also be a designated
9 representative for the 30(b)(6) deposition. The parties hereby agree and stipulate to extend the
10 discovery cut-off date for the limited purpose of deposing Mr. Soni and izmo CRM per the
11 deposition notices. Mr. Soni has agreed to present himself for deposition between June 1 through
12 June 3.

13 Provided that Mr. Soni is available for each deposition on two of the three days June 1 –
14 3, counsel do not anticipate that the requested time modification will have any other effect on the
15 schedule for the case.

16 In the event that izmo CRM determines that Mr. Soni will not be its designated
17 representative for the 30(b)(6) deposition, the same extension of time will apply to the deposition
18 of whomever it designates in his place and izmo CRM will provide that witness for deposition
19 before the expiration of the extended deadline.

20
21
22
23
24
25
26
27
28

1 Dated: April 26, 2011

2 HOPKINS & CARLEY
A Law Corporation

3

4 By: Shirley E. Jackson

5 Daniel F. Pyne
6 Shirley E. Jackson
7 Attorneys for Plaintiff and Counterdefendant
izmo CRM, INC.

8 Dated: April 26, 2011

9 FARRIS BOBANGO BRANAN PLC

10 By: John DiNapoli

11 John DiNapoli
Robert A. McLean
Attorneys for Defendant and Counterclaimant
PRIZE CORPORATION

12

13

14 **ORDER**

15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16 Dated: June 1, 2011

17 LUCY H. KOH

18 HON. LUCY H. KOH